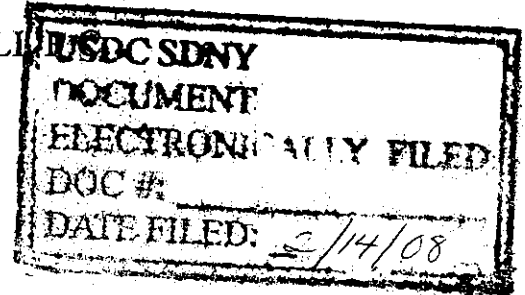


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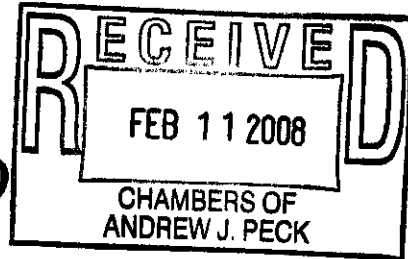


February 8, 2008

MEMO ENDORSED
-12

BY ECF

Honorable Andrew J. Peck
United States Magistrate Judge
U.S. Courthouse
500 Pearl Street, Room 1370
New York, New York 10007



Re: *Akinyemi v. Chertoff*, 07 CV 4048 (AJP)

Dear Judge Peck:

I am the attorney for the plaintiff in the above-referenced action. I write this letter to respectfully seek an extension of time for plaintiff to serve and file her opposition papers to the defendant's pending motion for summary judgment. Plaintiff's papers are due today, Friday, February 8, 2008.

I discussed the extension with counsel for the Government, Assistant United States Attorney John D. Clopper. While Mr. Clopper indicated that he will not oppose the grant of a two weeks extension to the plaintiff, I reckon that I will need more than two weeks for reasons which I shall state. When the Government served me with its motion papers on January 25, 2008, I already had briefs which I was working on. One of those briefs was in Stack v. Midwood, Dkt. #2007-5123 (Appellate Division, Second Department), which was filed on January 31, 2008. The other was in King v. Brando, 07-3678-cv (Second Circuit), which was filed on February 4, 2008.

I was working simultaneously on these briefs while still attending to motions, court conferences, client interviews, correspondence and my other daily chores as a solo practitioner. I have already started working on plaintiff's opposition to the summary judgment motion, but I am far from done. Currently, I am working on a Reply Brief which is due for filing in the Second Circuit of Appeals by Wednesday, February 15, 2008. This is in the case of Kelsey v. City of New York, 07-0290-cv.

Honorable Andrew J. Peck
United States Magistrate Judge
February 8, 2008
Page 2

In light of the foregoing, I respectfully request a 30-day extension from today, to serve and file plaintiff's opposition papers to the motion for summary judgment. This is plaintiff's first application for extension of time within which to respond to the summary judgment motion.

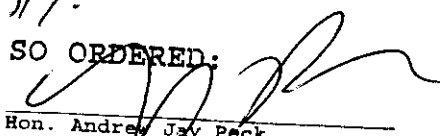
Respectfully submitted,

/s/ K.C. Okoli
K.C. Okoli
(KO-7222)

cc: John D. Clopper, AUSA (By Fax)

MEMO ENDORSED 2/14/08
The schedule was set long ago and
Mr. Okoli should have been better.
Glover gave out on 2/29.
Higart's log is due 3/7.

SO ORDERED:


Hon. Andrew Jay Peck
United States Magistrate Judge


BY FAX

FAX TRANSMITTAL SHEET



**ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

Southern District of New York
United States Courthouse
500 Pearl Street, Room 1370
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933
Telephone No.: (212) 805-0036

Dated: February 14, 2008

Total Number of Pages: 3

TO	FAX NUMBER
Kenechukwu Chudi Okoli, Esq.	212-268-3443
John D. Clopper, Esq.	212-637-0033

TRANSCRIPTION:

MEMO ENDORSED 2/14/08

The schedule was set long ago and Mr. Okoli should plan better. Extension granted only to 2/29. The Govt's reply is due 3/7.